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Attorneys for Defendants Shenzhen Senior Technology
Material Co. Ltd. (US) Research Institute, and
Shenzhen Senior Technology Material Co. Ltd.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CELGARD, LLC,

Plaintiff,

v.

SHENZHEN SENIOR TECHNOLOGY
MATERIAL CO. LTD. (US) RESEARCH
INSTITUTE AND SHENZHEN SENIOR
TECHNOLOGY MATERIAL CO. LTD.,

Defendants.

CASE NO. 4:19-cv-5784-JST

**DECLARATION OF XIAOMIN (STEVEN)
ZHANG**

**SUBJECT TO INTERIM PROTECTIVE
ORDER**

Judge: Jon S. Tigar

REDACTED VERSION OF
DOCUMENT SOUGHT TO BE
SEALED

1 I, Xiaomin (Steven) Zhang, state and declare as follows:

2 1. I am the Chief Technology Officer (“CTO”) of Shenzhen Senior Material
3 Technology Co., Ltd. (“Senior Technology”).

4 2. I obtained a PhD in Polymer Physics & Science from the Chinese Academy of
5 Sciences in 1997. Since then, I have worked in various research and/or product development
6 capacities for the National Research Council Canada (NRC), GE Advanced Materials, and
7 Celgard, LLC (“Celgard”). I have authored or contributed to over 30 papers in international
8 journals and am the inventor of multiple patents. Based on my studies and work experience, I
9 have expertise in polymer materials, polymer-structure-processing-properties relationship, as
10 well as membrane and separator development and production.

11 3. I worked at Celgard for approximately 12 years as part of its research and
12 development team. When I left Celgard in 2016, I held the position of a Polypore Fellow and
13 Celgard Technical Associate.

14 4. In 2017, I joined Senior Technology. REDACTED

15 REDACTED

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19 REDACTED

20 5. I left Celgard for two primary reasons. First, in 2015, Celgard merged with
21 Asahi-Kasei, a Japanese company. After the merger, I felt that the corporate culture of Celgard
22 changed for the worse, with less transparency and engagement between the Japanese
23 management and the United States Celgard team. I subsequently became less confident in my
24 future with Celgard and the future of the company. For example, due to their concerns regarding
25 the company as expressed to me, many top-level staff engineers and scientists left Celgard after
26 the merger, including seven key research and development PhD scientists and team leaders.
27 Second, my wife, who is from China, became ill in 2016, and western medicine does not offer
28 her any effective treatments for her illness. As a result, I became interested in opportunities that

1 would allow me to work in China, so that my wife could explore alternative traditional Chinese
2 medicine treatment options for her illness.

3 6. In light of statements Senior Technology made to me at the time and have since
4 made to me, I believe that Senior Technology engaged me based on my general industry
5 experience and knowledge about battery separators. Senior Technology never indicated any
6 intention to engage me in order to steal any Celgard confidential information or trade secrets and
7 at no point in time has anyone at Celgard asked me to disclose such information or trade secrets.

8 7. Since I left Celgard, I have not accessed any Celgard confidential information or
9 trade secrets.

10 8. I have not disclosed any Celgard confidential information or trade secrets to
11 anyone at Senior Technology.

12 9. I have not used any Celgard confidential information or trade secrets in
13 connection with any of my work for Senior Technology.

14 10. I have preserved any and all materials, including computing devices and
15 electronic removable media in my possession, custody or control to the extent such materials are
16 needed for discovery in this litigation.

17 11. I understand Celgard claims that I helped Senior Technology improve the thermal
18 shrinkage and strength of the SD216202 separator. This claim is not true. REDACTED

19 REDACTED

20 REDACTED

21 12. I understand Celgard also suggests that I helped Senior Technology introduce 20
22 new products by using Celgard's confidential information and trade secrets. Celgard does not
23 identify what new products it is referring to. Regardless, to my knowledge, no Celgard
24 confidential information or trade secrets were used in any new Senior Technology product
25 developed or introduced after I joined Senior Technology.

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I hereby declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 5th day of December 2019 in Shenzhen, China.

By:



Xiaomin (Steven) Zhang